

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03-md-1570
(GBD)(SN)

This document relates to:

BNY Mellon, et al. v. Islamic Republic of Iran, No. 1:19-cv-11767 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Brian Wilkes, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Brian Wilkes, and I was the fiancé and life partner of Lorraine Antigua (“Lorraine”) who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration to demonstrate I was the functional equivalent of Lorraine’s spouse.
2. Lorraine and I began dating in April or May 1999. Lorraine and I met at my going away party prior to my leaving New Jersey for North Carolina. Lorraine and I had an immediate strong connection. Upon my departure, we continued dating and traveled frequently between New Jersey and North Carolina to be with each other. When Lorraine traveled to see me, she came with her dog, and occasionally with her children.
3. While I initially planned to purchase a home in North Carolina, Lorraine and I decided I would rent instead because of our feelings for each other and the realities of our life situation at the time. We made a joint decision for Lorraine to delay moving with me to North Carolina because she was then uncertain of her employment and we did not want to remove her children from New Jersey where their father resided. Because of Lorraine’s employment and family situation, in April 2001 I resigned from my high-level management position with General

Electric and moved back to New Jersey to live with Lorraine and her children. This was worth it because Lorraine and I planned to have children and grow old together.

4. Lorraine and I got engaged the first night we met, but we became officially engaged in October 2000. I gave her a rubber hose washer out of the end of a hose as a ring and later bought her a diamond bracelet on our first anniversary. We told our friends and family about our engagement and everyone was so excited for us. While we did not set a wedding date, Lorraine said she wanted to be done having children at 35, which gave us 3 years. Lorraine did not want a large wedding and we planned to have a drive thru wedding in Las Vegas with the kids on a Harley Davidson.

5. As life partners, Lorraine and I both contributed financially to our life together. I occasionally paid the mortgage and electric and telephone bills, I bought food for us from the grocery store and restaurants, and I usually paid for vacations. Lorraine contributed to the mortgage and financially supported her children.

6. At the time of Lorraine's death we lived together and shared our lives as husband and wife. We were the love of each other's lives. *See* photos attached as Exhibit 1. We took care of each other and did things married couples do, such as shared decisions on finances, vacations, kids' activities, pets, and maintenance on cars and homes. When Lorraine was unemployed at one point, I helped financially and morally any way I could with her children. I was a major influencer on her decision to accept the Cantor Fitzgerald position. Lorraine and I loved music and went to many concerts together, including seeing Creed perform at Jones Beach. We loved to travel and went on vacations to Sandy Hook, NJ, the Outer Banks, and Cozumel, Mexico, where we scuba dived.

7. In addition to experiencing new things, Lorraine and I also had our rituals of things we enjoyed together. For example, Lorraine and I often went to What's Your Beef restaurant in Rumson NJ, where we enjoyed nights of good food and laughter.

8. There is no doubt that Lorraine and I were family. We could not have been more excited to spend the rest of our lives together and were with each other until Lorraine's tragic death on 9/11. We were very close with each other's families. Lorraine spent time with my grandmother, mother, and stepfather, and they loved her. I had a great relationship with Lorraine's mother and stepfather, and we visited them in Florida where they retired. I was very close with Lorraine's children. We decorated the Christmas tree together as a family and I taught her son, among other things, how to cut the grass and clean the swimming pool. We watched movies together as a family and spent time in the backyard where I grilled and we swam in the pool. I took the kids to school and picked them up. We walked the dogs together as a family.

9. Following Lorraine's death, I received funds from Cantor Fitzgerald (Lorraine's former employer) and the American Red Cross. Additionally, family and friends provided food and emotional support. I lived with Lorraine's mother and stepfather in Lorraine's house in New Jersey for approximately one year after 9/11.

10. Lorraine called me on 9/11 and told me a plane hit her building. She said there was fire and smoke everywhere and she would call me after she left the building. Upon hearing the World Trade Center collapsed, I prayed Lorraine would be found alive. I did not want to believe the love of my life left this world so suddenly and unexpectedly. I eventually had to accept the terrible truth that Lorraine was really gone.

11. When I woke up on September 11, 2001, I never imagined I would never see Lorraine again. After all, Lorraine and I looked forward to getting married and spending the rest

of our lives together. Lorraine was stolen away from me, and I feel her loss every day and share fond memories of her. She is forever in my heart.

12. Lorraine and I shared our lives as committed life partners with the deepest love for one another. We considered each other to be family. Accordingly, I should be deemed the functional equivalent of Lorraine's spouse.

Executed on: 01/16/2022

Name (Signature): 

Name (Print): Brian Wilkes



